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6 *Attorneys for Defendant*  
7 *GTI Nevada, LLC d/b/a Rise*  
8 *Carson City*

9  
10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 CELIA BERNA,

13 Plaintiff,

14 vs.

15 GTI NEVADA, LLC D/B/A RISE CARSON  
16 CITY,

17 Defendant.

Case No. 3:25-cv-00229-ART-CLB

**ORDER GRANTING STIPULATION TO  
EXTEND DEADLINE FOR  
DEFENDANT TO RESPOND TO  
PLAINTIFF'S COMPLAINT  
(FIRST REQUEST)**

18 IT IS HEREBY STIPULATED by and between Plaintiff Celia Berna ("Plaintiff"), by and  
19 through her counsel, Mark Mausert Law, and Defendant, GTI Nevada, LLC d/b/a Rise Carson  
20 City ("Defendant"), by and through its counsel, the law firm of Jackson Lewis P.C., that  
21 Defendant shall have a 30-day extension up to and including **July 2, 2025**, in which to file its  
22 response to Plaintiff's Complaint. This Stipulation is submitted and based upon the following:

23 1. Defendant was served with the Summons and Complaint on May 12, 2025, (ECF  
24 No. 1) making Defendant's response to Plaintiff's Complaint currently due on June 2, 2025.

25 2. Defendant was recently retained and is still in the process of investigating  
26 Plaintiff's allegations which include significant monetary damages, including, punitive damages.

27 3. The Parties have agreed to extend the deadline for Defendant to file its response to  
28 Plaintiff's Complaint to July 2, 2025, to allow Defendant sufficient time to address the allegations

1 within the Complaint.

2 4. This is the first stipulation to extend the time for Defendant to respond to  
3 Plaintiff's Complaint.

4 5. The Parties believe these circumstances constitute good cause for granting an  
5 extension. *See* Fed. R. Civ. P. 6(b)(1).

6 6. This Stipulation is made in good faith and not for the purpose of delay.

7 7. Nothing in this Stipulation and Order shall operate to waive, relinquish, or impair  
8 any claim, defense, objection, or right of any party in this case. Further, nothing in this Stipulation  
9 and Order shall be construed as an admission of or consent to the merit or validity of any claim,  
10 defense, objection, or right by any party in this case.

11 Dated this 28th day of May, 2025.

12 MARK MAUSERT LAW

JACKSON LEWIS P.C.

13 /s/ Sean McDowell  
14 Mark Mausert, Bar # 2398  
15 Sean McDowell, Bar # 15962  
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17 Reno, NV 89512

/s/ Thomas W. Maroney  
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Las Vegas, Nevada 89101

16 *Attorneys for Plaintiff*  
17 *Celia Berna*

*Attorneys for Defendant GTI Nevada, LLC d/b/a*  
*Rise Carson City*

18 **ORDER**

19 IT IS SO ORDERED.

20   
21 \_\_\_\_\_  
22 United States Magistrate Judge

23 Dated: May 28, 2025  
24 \_\_\_\_\_

25 4933-5152-4679, v. 1